

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
GARY L. HALLING, Cal. Bar No. 66087
3 MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524
Four Embarcadero Center, 17th Floor
4 San Francisco, California 94111-4106
Telephone: 415-434-9100
5 Facsimile: 415-434-3947
Email: ghalling@sheppardmullin.com
6 Email: mscarborough@sheppardmullin.com

7 KING & BALLOW
ALAN L. MARX (admitted *pro hac vice*)
8 STEVEN C. DOUSE (admitted *pro hac vice*)
1100 Union Street Plaza
9 315 Union Street
Nashville, Tennessee 37201
10 Telephone: 615-259-3456
Facsimile: 615-726-5413
11 Email: amarx@kingballow.com
Email: sdouse@kingballow.com

12 Attorneys for Defendants
13 MEDIANEWS GROUP, INC. and
14 CALIFORNIA NEWSPAPERS PARTNERSHIP

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 CLINTON REILLY,

20 Plaintiff,

21 v.

22 MEDIANEWS GROUP, INC.; THE
HEARST CORPORATION; STEPHENS
23 GROUP INC.; GANNETT CO., INC.; and
CALIFORNIA NEWSPAPERS
24 PARTNERSHIP,

25 Defendants.

Case No. 06-CV-04332-SI

[Complaint Filed: July 14, 2006]

STIPULATION AND [PROPOSED]
CASE MANAGEMENT ORDER

Judge: Hon. Susan Illston

Trial Date: None set

WHEREAS on July 14, 2006, Plaintiff Clinton Reilly filed his complaint in this action and the Court entered an Order Setting Initial Case Management Conference and ADR Deadlines;

WHEREAS on July 28, 2006, the Court entered an Order Denying Plaintiff's Application for Temporary Restraining Order;

WHEREAS, Plaintiff has requested that Defendants MediaNews Group, Inc., The Hearst Corporation, Stephens Group, Inc., Gannett Co., Inc. and California Newspapers Partnership (collectively, "Defendants") agree to expedited discovery and trial proceedings;

WHEREAS the parties have met and conferred and believe good cause exists for relief from the scheduling requirements of Rules 16 and 26 of the Federal Rules of Civil Procedure and the Local Rules;

WHEREAS the parties have met and conferred and agreed to the accelerated case management schedule set forth below, subject to the Court's approval and availability;

NOW THEREFORE, pursuant to Northern District Civil Local Rules 6-2(a) and 16-2(e), Plaintiff and Defendants hereby stipulate and agree to the following case management schedule:

1. This schedule concerns only (a) the acquisitions of the McClatchy newspapers that were the subject of the Court's Order Denying Plaintiff's Application for Temporary Restraining Order; and (b) Hearst's proposed equity investment in MediaNews Group's non-Bay Area properties.
2. This schedule does not concern any potential future broadening of Hearst's proposed equity investment in MediaNews Group pursuant to equity conversion provisions or otherwise: Hearst and MediaNews Group expect that any such transaction, if it were to occur, would be the subject of future antitrust Hart-Scott-Rodino Act regulatory filings. If such a transaction occurs, and plaintiff elects to challenge it, the parties would propose an appropriate schedule at that time.

3. The deadline for all parties to propound non-expert written discovery shall be August 29, 2006.
4. The deadline for all parties to respond to non-expert written discovery shall be September 29, 2006.
5. The deadline for all parties to complete non-expert depositions shall be October 31, 2006.
6. The deadline for Plaintiff to file his expert report(s) shall be November 6, 2006.
7. The deadline for Defendants to file their expert reports shall be November 13, 2006.
8. The deadline for all parties to complete expert depositions shall be December 1, 2006.
9. The deadline for all parties to file and serve dispositive pre-trial motions shall be December 8, 2006.
10. The deadline for all parties to file and serve any opposition to a dispositive pre-trial motion shall be January 5, 2007.
11. The deadline for all parties to file and serve any reply in support of a dispositive pre-trial motion shall be January 12, 2007.
12. The deadline for all parties to exchange trial exhibits shall be January 26, 2007.
13. The deadline for all parties to file and serve motions in limine shall be January 31, 2007.
14. The deadline for all parties to file and serve pre-trial conference statements and exhibit and witness lists shall be February 7, 2007.
15. A pretrial conference will be held on February 13, 2007 at 3:30 p.m.
16. Trial shall commence on February 26, 2007.

IT IS SO STIPULATED.

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2 Dated: August 21, 2006

3 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
4 KING & BALLOW

5
6 By /S/
GARY L. HALLING

7
8 Attorneys for Defendants
9 MEDIANEWS GROUP, INC. and
10 CALIFORNIA NEWSPAPERS PARTNERSHIP

11 Dated: August __, 2006

12 LATHAM & WATKINS LLP
13 GREGORY P. LINDSTROM
14 DANIEL M. WALL
15 505 Montgomery Street, Suite 2000
16 San Francisco, CA 94111-2562
17 Telephone: (415) 391-0600
18 Facsimile: (415) 391-8095
19 Email: gregory.lindstrom@lw.com
20 Email: dan.wall@lw.com

21 By DANIEL M. WALL

22 Attorneys for Defendant
23 THE HEARST CORPORATION
24
25
26
27
28

1
2 Dated: August __, 2006

3 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
4 KING & BALLOW

5
6 By

GARY L. HALLING

7
8 Attorneys for Defendants
9 MEDIANEWS GROUP, INC. and
10 CALIFORNIA NEWSPAPERS PARTNERSHIP

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12 LATHAM & WATKINS LLP
13 GREGORY P. LINDSTROM
14 DANIEL M. WALL
15 505 Montgomery Street, Suite 2000
16 San Francisco, CA 94111-2562
17 Telephone: (415) 391-0600
18 Facsimile: (415) 391-8095
19 Email: gregory.lindstrom@lw.com
20 Email: dan.wall@lw.com

21 By



DANIEL M. WALL

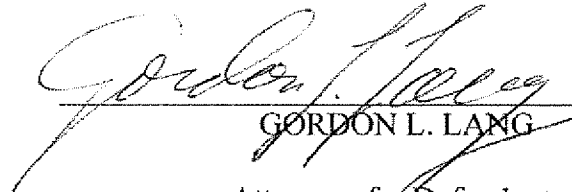
22 Attorneys for Defendant
23 THE HEARST CORPORATION
24
25
26
27
28

1 Dated: August 21, 2006

2
3 NIXON PEABODY LLP
4 GORDON L. LANG (admitted *pro hac vice*)
5 401 9th Street, N.W.
6 Washington, D.C. 20004-2128
7 Telephone: (202) 585-8319
8 Facsimile: (202) 585-8080
9 Email: glang@nixonpeabody.com

10 NIXON PEABODY LLP
11 JOHN J. RIDDLE
12 Two Embarcadero Center, Suite 2700
13 San Francisco, CA 94111-3996
14 Telephone: (415) 984-8200
15 Facsimile: (415) 984-8300
16 Email: jriddle@nixonpeabody.com

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18
19
20
21
22
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24
25
26
27
28
By


GORDON L. LANG

Attorneys for Defendants
GANNETT CO., INC. and
STEPHENS GROUP, INC.

1 Dated: August 18, 2006

2 ALIOTO LAW FIRM
3 JOSEPH M. ALIOTO
4 JOSEPH M. ALIOTO, JR.
5 THOMAS P. PIER
6 555 California Street, Suite 3160
7 San Francisco, CA 94104
8 Telephone: (415) 434-8900
9 Facsimile: (415) 434-9200

6 GRAY, PLANT, MOOTY, MOOTY & BENNETT, P.A.
7 DANIEL R. SHULMAN
8 500 IDS Center, 80 South Eighth Street
9 Minneapolis, MN 55402
10 Telephone: (612) 632-3335
11 Facsimile: (612) 632-4335

11 By



12 JOSEPH M. ALIOTO
13 DANIEL R. SHULMAN

14 Attorneys for Plaintiff
15 CLINTON REILLY

16 **ORDER**

17 Pursuant to the foregoing stipulation of the parties, the declaration of
18 counsel, and for good cause shown, the foregoing case management schedule is hereby
19 adopted by the Court. The Order Setting Initial Case Management Conference and ADR
20 Deadlines is VACATED.

21
22 IT IS SO ORDERED.

23
24 August ____, 2006



25 HON. SUSAN ILLSTON
26 UNITED STATES DISTRICT COURT JUDGE